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*Attorneys for Appellant* JEFFREY B. GUINN

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JEFFREY B. GUINN

Appellant,

vs.

CDR INVESTMENTS, LLC, a Nevada Limited Liability Company; DONNA A. RUTHE as trustee for the CHARLES L. RUTHE TRUST and on behalf of his Individual Retirement Account; DONNA A. RUTHE, in her representative capacity as trustee for the FRANK E. GRANIERI REVOCABLE LIVING TRUST

Respondents.

Case No. BK-S-13-18986-BTB  
CHAPTER 7

Adversary No. BK-S-14-01007-BTB

Case No: 2:19-cv-00649-JAD

**STIPULATION TO EXTEND  
DEADLINE FOR REPLY BRIEF FOR  
APPEAL**

**(Fifth Request)**

ECF No. 21

Appellant Jeffrey B. Guinn (“Appellant”), by and through his attorney of record, the law firm of Bailey❖Kennedy, and Respondents CDR Investments, LLC and Donna A. Ruthe, as trustee for the Charles L. Ruthe Trust and his individual retirement account and the Frank E. Granieri Revocable Trust (“Respondents”), by and through their attorneys of record, the law firm of Sylvester & Polednak, Ltd., hereby STIPULATE AND AGREE that:

- A National Emergency related to the impact of the COVID-19 global pandemic has been declared along with emergency declarations by several states across the United States, including Nevada.

- Most, if not all, state courts and all federal courts in Nevada have recognized the need for stays/postponements of litigation matters and cases.
- Undersigned counsel, who is primarily responsible for the Reply Brief, needs a short extension to complete Appellant's Reply Brief. Undersigned counsel has been out of the office the past few weeks with his family, and while able to work remotely, he cannot work nearly as efficiently as was able to do from his office.
- The Memorandum Decision that is the subject of this appeal is quite lengthy (115 pages). The underlying adversary proceeding trial was three weeks long. As shown by the Designation of Record and Statement on Appeal [Dkt. # 463], there are numerous relevant exhibits. Thus, this appeal is more complicated than a typical adversary proceeding appeal.
- Due to the above, Appellant respectfully requests a short extension of six calendar days to complete his Reply Brief.
- Accordingly, the parties stipulate to extend the briefing schedule as follows:
  - Reply Brief – August 27, 2020.

DATED this 20<sup>th</sup> day of August, 2020.

**SYLVESTER & POLEDNAK, LTD.**

By /s/ Matthew T. Kneeland  
 Jeffrey R. Sylvester, Esq.  
 Matthew T. Kneeland, Esq.  
 1731 Village Center Circle  
 Las Vegas, NV 89134  
*Attorneys for Respondents*

DATED this 20th day of August, 2020.

**BAILEY ♦ KENNEDY**

By /s/ Joseph A. Liebman  
 John R. Bailey, Esq.  
 Joseph A. Liebman, Esq.  
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*Attorneys for Appellant*

**IT IS SO ORDERED.**

  
 UNITED STATES DISTRICT JUDGE

DATED: 8-21-2020